

HOUSTON BELT & TERMINAL RAILWAY COMPANY

UNION STATION BUILDING, HOUSTON, TEXAS 77002

OPERATING THE TERMINALS OF

MISSOURI PACIFIC RAILROAD CO.
FORT WORTH AND DENVER RAILWAY CO.

ATCHISON, TOPEKA AND SANTA FE RAILWAY CO.
CHICAGO, ROCK ISLAND AND PACIFIC RAILROAD CO.

July 23, 1981

OLIN CORP - S P OLIVER
780000602028

Re: Investigation of Houston
Belt & Terminal Railway
Company Right-of-Way at
Wallisville Road, Houston,
Texas

Environmental Protection Agency
Region 6
1201 Elm Street
Dallas, Texas

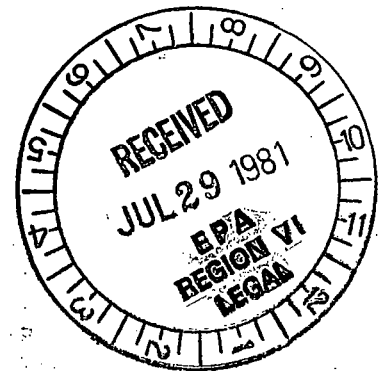
→ Attention: Mr. Ralph Corley.

Dear Sirs:

Your letter of June 19, 1981, was received on June 24, 1981, and this letter is submitted in partial response.

As a result of our investigation, it seems apparent that the pesticide contamination found in the Houston Belt & Terminal Railway Company ("HB&T") right-of-way at Wallisville Road was not caused by the act or inaction of any officer or employee of the HB&T. It appears that these materials have gotten into the right-of-way as a result of migration or erosion from the adjacent Southern Pacific Transportation Company property which was formerly occupied by a pesticide plant owned and operated by Olin Chemical Corporation. The particular pesticides found in our right-of-way were produced at that plant.

The HB&T has contacted the Southern Pacific Transportation Company and Olin Corporation on several occasions to assist in the development of a comprehensive plan for the cleanup of the Southern Pacific property as well as the HB&T right-of-way. We have been advised by Rollins Environmental Services, Inc. that any effort by any party to cleanup the right-of-way without a corresponding coordinated effort to cleanup the Southern Pacific property would not cure the problem and might ultimately make the problem worse.



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The HB&T is making every effort to bring this matter to some resolution as promptly as possible. As progress is made we will be in contact with you.

If you have any questions, please do not hesitate to call Mr. Jim Martin (713) 227-4341 or our attorney Louis S. Zimmerman (713) 651-5151.

Yours very truly,


J. E. Martin

cc: H. W. Ritter
L. Zimmerman